

## **Privacy Notice for California Residents**

**Effective Date:** January 1, 2020

This California Privacy Notice (this “notice”) applies to “Consumers” as defined by the California Consumer Privacy Act (“CCPA”) as a supplement to Kirkhill Inc. and its subsidiaries’ (“Company” “us” “we” our”) other privacy policies or notices. Please see also any privacy policy or notice of general applicability posted or referenced on our website: [www.kirkhill.com](http://www.kirkhill.com).

To aid in readability, in some places we have abbreviated or summarized CCPA terms or language. Terms defined in the CCPA that are used in this notice shall have the same meaning as in the CCPA.

For more information on this notice or your California privacy rights contact us at (714) 529-4901, email us at [compliance@kirkhill.com](mailto:compliance@kirkhill.com) or, write to us at: 300 E Cypress St, Brea, CA 92821.

### **PERSONAL INFORMATION WE COLLECT**

We have collected the following categories of personal information from consumers within the last twelve (12) months:

#### **Identifiers**

This may include but is not limited to: a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.

We collect this information via third party web site hosting services, as well as directly submitted forms via web or email, for the purpose of processing interactions and transactions, performing services, security, and general market research.

#### **Personal Records**

This may include information such as: physical characteristics or description, signature, telephone number, education, employment, employment history, or contractor insurance policy number.

We collect this information via online or email forms for the purpose of processing interactions and transactions, performing services, security, and general market research.

#### **Internet Usage Information**

This may include, but is not limited to: browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.

We collect this information via third party web site hosting services for the purposes of general market research.

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as personal information and we reserve the right to convert, or permit others to convert, your personal information into deidentified data or aggregate consumer information.

Subject to restrictions and obligations of the CCPA, our vendors may also use your personal information for some or all of the above listed business purposes. Our vendors may themselves engage services providers or subcontractors to enable them to perform services for us, which sub-processing is, for purposes of certainty, an additional business purpose for which we are providing you notice.

## **SHARING PERSONAL INFORMATION**

We may share personal information with third parties for a business purpose. In the last twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers
- Personal Records
- Customer Account Details / Commercial Information
- Internet Usage Information

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the last twelve (12) months, we have not sold any personal information.

## **CALIFORNIA PRIVACY RIGHTS**

We provide California Consumers the privacy rights described in this section. You have the right to exercise these rights via an authorized agent who meets the agency requirements of the CCPA and related regulations. As permitted by the CCPA, any request you submit to us is subject to an identification process. We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the consumer about whom we collected personal information.

If we cannot comply with a request, we will explain the reasons in our response. We will use personal information provided in your request only to verify your identity or authority to make the request and to track and document request responses, unless you also gave it to us for another purpose.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or clearly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Additionally, you have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your personal information that we have collected in the period that is 12 months prior to the request date and are maintaining. Once we receive and confirm your request, we will disclose to you:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- A list of the categories of PI sold about you in the prior 12 months, or that no sale occurred. If we sold your PI, we will explain:

- The categories of your PI we have sold.
- The categories of third parties to which we sold PI, by categories of PI sold for each third party.

### Deletion Request Rights

Except to the extent we have a basis for retention under CCPA, you may request that we delete your personal information that we have collected directly from you and are maintaining. Our retention rights include, without limitation, to complete transactions and service you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, to comply with law, to exercise or defend legal claims, and to cooperate with law enforcement. Note also that we are not required to delete your personal information that we did not collect directly from you.

### Do Not Sell

We do not sell your personal information as such is defined under the CCPA, and until such time as we change this policy by updating this notice, will treat personal information collected under that policy as subject to a do not sell request.

### Our and Other's Rights

Notwithstanding anything to the contrary, we may collect, use and disclose your personal information as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

### Changes to Our Privacy Notice

We reserve the right to amend this notice at our discretion and at any time. When we make changes to this notice, we will notify you through a notice on our website homepage.

### Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (714) 529-4901

Website: [www.kirkhill.com](http://www.kirkhill.com)

Email: [compliance@kirkhill.com](mailto:compliance@kirkhill.com)

Postal Address: 300 E Cypress St, Brea, CA 92821

Attn: IT Manager